

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR

**American
Chemistry
Council** Chemistry
Makes a Difference

August 25, 2003

Via US Mail and e-mail

Marianne Horinko, Acting Administrator
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

**Re: Rubber and Plastic Additives (RAPA) Panel
Revised HPV Chemical Challenge Program Submission
Substituted Diphenylamines Category
Revised Category Justification and Testing Rationale**

2003 AUG 27 PM 2:44
RECEIVED
OPPT/CBIC

Dear Ms. Horinko:

The RAPA Panel of the American Chemistry Council is pleased to submit the revised test plan and supporting documents for the Substituted Diphenylamines category to EPA's HPV Chemical Challenge Program (Program). The RAPA Panel includes the following member companies: Alco Chemical Corporation; Bayer Polymers LLC; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and R.T. Vanderbilt Company, Inc.

The category justification, test plan and robust summaries in this submission are revisions of documents first submitted in support of the Substituted Diphenylamines category on December 18, 2001. In revising these documents, comments received from EPA (dated November 27, 2002) and Environmental Defense (dated May 15, 2002) have been considered. The revised documents are for the category consisting of eight chemicals:

RAPA Panel Substituted Diphenylamines Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
68411-46-1	Benzenamine, N-Phenyl-, reaction products with 2,4,4-trimethylpentene
68442-68-2	Benzenamine, N-phenyl-, styrenated
184378-08-3	Benzenamine, N-phenyl-
10081-67-1	Benzenamine, 4-(1-methyl-1-phenylethyl)-N-[4-(1-methyl-1-phenylethyl) phenyl]-
101-67-7	Benzenamine, 4-Octyl-N-(4-octylphenyl)



Responsible Care®

RAPA Panel Substituted Diphenylamines Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
36878-20-3	Benzenamine, ar-nonyl-N-nonylphenyl
68608-77-5	Benzenamine, 2-ethyl-N-(2-ethylphenyl)-, (tripropenyl) derivatives
68921-45-9	Benzenamine, N-Phenyl-, reaction products with styrene and 2,4,4-trimethylpentene

Note that one chemical not included in the original submission has been added [Benzenamine, 4-(1-methyl-1-phenylethyl)-N-[4-(1-methyl-1-phenylethyl) phenyl]- (CAS number 10081-67-1)] and one original category member [Diphenylamine, 4, 4' -bis (1,1, 3, 3 - tetramethylbutyl)- (CAS number 15721-78-5)] is no longer sponsored by the RAPA Panel and has been removed.

Robust summaries, revised as appropriate, for each of the eight sponsored chemicals are also attached.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments